



**Via Electronic Delivery**

November 29, 2023

Office of Regulations and Interpretations  
Employee Benefits Security Administration  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

RE: Docket ID number: EBSA-2023-0014

To Whom It May Concern:

This letter is to request the Institute for Portfolio Alternatives (“IPA”) be allowed to testify at the hearing regarding the proposal entitled Retirement Security Rule: Definition of an Investment Advice Fiduciary and Associated Prohibited Transaction Exemption Amendments, Docket ID number EBSA-2023-0014. As required by the Department of Labor, the following information relates to this request.

**Individual who will testify:**

Kevin L. Walsh  
Suite 1200  
1701 Pennsylvania Ave, NW  
Washington, DC 20006  
(202) 861 – 0620  
kwalsh@groom.com

**Name of organization whose views will be expressed:**

The IPA is the leading trade organization representing asset managers, broker-dealers, registered investment advisers and other entities that provide portfolio diversifying investments to investors. For over 35 years, the IPA has advocated for increased investor access to alternative investment strategies with low correlation to equity markets, as part of a diversified portfolio. Such strategies include real estate, public and private credit and other real assets through investment vehicles such as non-listed real estate investment trusts and business development companies, closed-end funds and interval funds, among others.

Thank you for considering the request to testify. If you need any further information, please feel free to reach out to me or Gina Gombar, Associate General Counsel, at (202) 548-7190.

Sincerely,

A handwritten signature in black ink, appearing to read "Anya Coverman", with a long horizontal flourish extending to the right.

Anya Coverman  
President & CEO  
Institute for Portfolio Alternatives